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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SELENE OLIVIA CORONA VILLA, an
individual,

Plaintiff,

v.

LOYA INSURANCE COMPANY dba
FRED LOYA INSURANCE; DOES I-X, and
ROE CORPORATIONS I-X, inclusive,

Defendants.

CASE NO. 2:25-CV-00378

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

[FIRST REQUEST]

The parties to this action, Plaintiff, SELENE OLIVIA CORONA VILLA ("Plaintiff"), and Defendant, LOYA INSURANCE COMPANY dba FRED LOYA INSURANCE ("Defendant") and (collectively, the "Parties"), by their respective counsel, hereby stipulate and request that the Court approve their request to extend the discovery deadline until November 3, 2025, pursuant to Local Rule IA 6-1 and Local Rule 26-3.

Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the first discovery extension requested in this matter.

DISCOVERY COMPLETED TO DATE

- The parties conducted an FRCP 26(f) conference on May 28, 2025.

- The parties served and exchanged their respective FRCP 26(a) initial disclosures.
- Plaintiff served upon Defendant one set of Requests for Admissions, Interrogatories and Requests for Production of Documents on July 24, 2025. Defendant has not served their responses.

DISCOVERY TO BE COMPLETED

- PMK Deposition of Defendant.
- Plaintiff's Deposition.

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested extension. The parties have been working diligently to complete depositions.

The parties warrant and represent that this extension is in good faith and not for purposes of delay. As such, the parties are only requesting a sixty-day extension of the discovery deadlines.

[PROPOSED] NEW DISCOVERY DEADLINES

Initial Expert Disclosures

Currently: October 2, 2025

Proposed: **November 1, 2025**

Rebuttal Expert Disclosures

Currently: October 30, 2025

Proposed: **November 29, 2025**

Discovery Cut-Off Date

Currently: December 1, 2025

Proposed: **December 31, 2025**

Dispositive Motion Deadline

Currently: December 31, 2025

Proposed: **January 30, 2026**

Joint Proposed Pre-Trial Order

Currently: January 30, 2026

Proposed: **March 1, 2026 or 30 days after resolution of dispositive motions per Local Rule 26-1(b)(5).**

If this extension is granted, all remaining discovery mentioned above should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 19 day of September, 2025

DATED this 29th day of September 2025

MOSS BERG INJURY LAWYERS

RESNICK & LOUIS, P.C.

By: 
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By: /s/ Bradley Johnson
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Las Vegas, Nevada 89123
Attorneys for Defendant

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: October 1, 2025



RE: [External] Villa v. Loya

From Bradley Johnson <bjohnson@sjwlawfirm.com>

Date Mon 9/29/2025 11:56 AM

To Candace Wiltsie <candace@mossberglv.com>; Stephanie Jensen <SJensen@sjwlawfirm.com>

Cc Boyd Moss <Boyd@mossberglv.com>; Elise <elise@mossberglv.com>; Drue Solomon <Drue@mossberglv.com>

Yes you may

M. Bradley Johnson, Esq.

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Email: bjohnson@sjwlawfirm.com

From: Candace Wiltsie <candace@mossberglv.com>

Sent: Monday, September 29, 2025 11:00 AM

To: Bradley Johnson <bjohnson@sjwlawfirm.com>; Stephanie Jensen <SJensen@sjwlawfirm.com>

Cc: Boyd Moss <Boyd@mossberglv.com>; Elise <elise@mossberglv.com>; Drue Solomon <Drue@mossberglv.com>

Subject: Re: [External] Villa v. Loya

Importance: High

Good Morning Mr. Johnson,

I am following up on the proposed SAO to Extend Discovery Deadlines in the above referenced matter, as we have deadlines this week? May I affix your e-signature?

Regards,

Candace Wiltsie, Paralegal

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From: Candace Wiltsie <candace@mossberglv.com>
Sent: Friday, September 19, 2025 1:38 PM
To: Bradley Johnson <bjohnson@sjwlawfirm.com>; Stephanie Jensen <SJensen@sjwlawfirm.com>
Cc: Boyd Moss <Boyd@mossberglv.com>; Elise <elise@mossberglv.com>; Drue Solomon <Drue@mossberglv.com>
Subject: Re: [External] Villa v. Loya

Good Afternoon Mr. Johnson,

Please find attached the proposed SAO to Extend Discovery Deadlines in the above referenced matter, Please advise if you would like to make any changes or if I can affix your e-signature.

Regards,

Candace Wiltsie, Paralegal

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